



From: Levetzow, Kurt [DNR]
To: Hutchins, Brian [DNR]; Book, Kelli [DNR]; Sanfilippo, Joe [DNR]
Cc: Ostwinke, Dennis [DNR]; Bermel, Reid [DNR]; Thielen, Dennis [DNR]
Subject: GPC, Muscatine

Sent: Thu 12/4/2008 11:59 AM

A month or two back, I investigated a complaint against GPC in Muscatine regarding the visible emission cloud that is common (dare I say continuous) hanging over GPC. The emission point is their GEP stack, which is a common emission point for 6 coal fired boilers. As an outcome of my investigation, I requested they respond in writing to several questions I had. They did and we received that letter on 11-20-08.

In their letter, they talk about how they clean bottom ash out of the 6 boilers, and when they do, it stirs up dust and can cause spikes in opacity. They do this in every boiler every 2 hrs, one boiler at a time. They're claiming those "extra emissions" are exempt, since cleaning the bottom ash is needed to be done (which I agree) but they claim this is exempt since "the process is required to prevent the multicloners from plugging and thus is considered a control equipment cleaning procedure".

They indicate in their response that "during normal operations, the opacity levels in the GEP stack ranges from 25-35%". I'd have to think that any upset conditions, blowing soot, or the extra emissions from pulling bottom ash will elevate them over 40% opacity.

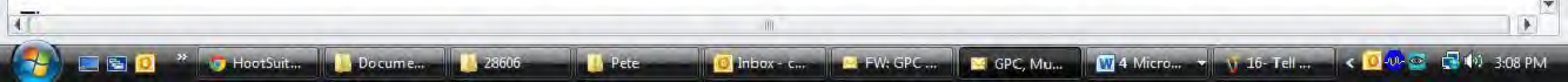
They also say they "understand blowing soot is an acceptable cleaning practice in boilers and not subject to excess emission reporting". Is that fact, or a myth that's just become accepted practice with operating coal fired boilers?

I think everyone would agree that multicloners are not the control of choice for properly cleaning particulate from a coal fired boiler....it may have been the best choice at one time, but the new boilers are using BagFilters. So do we just have sit back and wait for the new boiler MACT to come back out? GPC claims that they'll finish constructing and hooking up the new BF they built, but never completed after the Boiler MACT was vacated by EPA.....GPC also is claiming they'll be putting on a SC to control chlorine emissions too....it would be nice if DNR/EPA could require them to finish hooking up the BF and do away with the multicloners now instead of years from now. In my conversations with GPC's environmental people, they agree that the new BF would more or less do away with the haze that can be see above GPC and half of Muscatine on any given day....but they're waiting for someone (new Boiler MACT) to require them to do it.

My question is this....since Muscatine is or will be non-attainment soon, and by seeing the haze over GPC and southern Muscatine, can we enter into agreement with them through a Consent Order to move forward sooner? I am sure they're NOT going to welcome that....but I'd think we're justified. I'd guess Mark Stone could show lots of instances where the GEP stack has failed stack testing.

Anyone have any thoughts or comments????

If anyone would like to see GPC's response, which has more detailed info about what I am talking about, I'd be happy to forward to you.



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| <input type="checkbox"/> WASTEWATER | <input type="checkbox"/> WATER SUPPLY | <input checked="" type="checkbox"/> AIR QUALITY | <input type="checkbox"/> ANIMAL OPERATION (OPEN LOT) |
| <input type="checkbox"/> FLOODPLAIN | <input type="checkbox"/> LUST/UST | <input type="checkbox"/> STORMWATER | <input type="checkbox"/> ANIMAL OPERATION (CONFINEMENT) |
| <input type="checkbox"/> SOLID WASTE | | | |

STATEMENT OF COMPLAINT: The smoke stack is emitting a large amount of particulates that is turning the entire skyline brown, and this has been going on for the last two weeks.

REFERRED TO: Kurt
BY: [Signature] DATE: 10/12/10

IF COMPLAINT IS AFO RELATED:

COUNTY OFFICIAL CONTACTED: _____ DATE: _____ PHONE: _____

ACTION/RESOLUTION AND DATES:

10.14.10 - Tell me something I don't already know. I've seen these types of complts come through for months-years. GPC submits Qtrly reports w/ GEP's opacity exceedance numbers, so the excesses are noted at that time. The problem goes back to IDNR permitting GPC to use cyclones for controlling fine particulates (fly-ash). They should be expected to install BF's for control. We do need to remember there are ~6 CFB's feeding the GEP stack.

K —————



From: Piziali, Sarah [DNR]
To: Phelps, Dave [DNR]
Cc:
Subject: FW: GPC Referral

Sent: Wed 2/2/2011 10:30 AM

This is the latest on the GPC PSD and MON violation referral.

From: Book, Kelli [DNR]
Sent: Tuesday, February 01, 2011 1:24 PM
To: Thielen, Dennis [DNR]; Hutchins, Brian [DNR]; Piziali, Sarah [DNR]; Zayudis, Peter [DNR]
Subject: GPC Referral

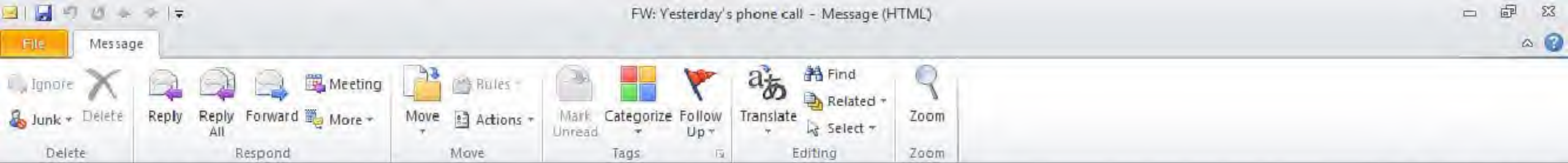
Okay we are back on a holding pattern with the GPC referral. The Director has requested Ed and I along with him have a conference call next week with GPC to discuss the air and water violations. I am not sure what this means, I think the referral is still on but the Director wants GPC to be well aware of why the referral is being requested. Was there a referral memo prepared for Joe - if so, could I have a copy of that? If at all possible I would like for the five of us to discuss the violations prior to meeting with the Director. Once I get a meeting time with the Director I will schedule us something.

Brian - by the way Tom's asbestos referral is back on hold as well. The Director now wants more information on that as well. I will hopefully be able to talk to the Director about it after the GPC meeting.

I think both referrals will go through, just may take a little more talking with the Director. It does likely mean both referrals will be at the May meeting.

Thanks - Kelli





From: Lande, Roger [DNR]
To: Book, Kelli [DNR]
Cc: Tormey, Ed [DNR]; Gieselman, Wayne [DNR]
Subject: FW: Yesterday's phone call

Sent: Wed 2/9/2011 2:55 PM

From: Durham, Mick [mailto:mick.durham@grainprocessing.com]
Sent: Wednesday, February 09, 2011 1:49 PM
To: Lande, Roger [DNR]
Subject: Yesterday's phone call

Roger:

Thanks for arranging the phone call yesterday. I think it was a good example of how the IDNR can better communicate with industry on pending matters. Prior to the call GPC had no clue that referral was being considered and likely would not have known until a certified letter came in the mail. There is no written policy or rule on what triggers referral or even notices of violation. Such a guidance could make the process more consistent.

Each of the four issues we discussed yesterday has either been resolved or is being actively addressed to reach resolution. IDNR is actually holding up the wastewater permitting (four months and counting) on what we believe is a simple modification that will resolve our wastewater issues. As you may not know we have been keeping the IDNR informed on all of the discussed items, including our progress on the gluten plant stack testing matter.

Please let us know if you believe we should be handling matters any differently.

Thanks again for for the call.

Mick

Mick Durham
Director of Environmental Services
Grain Processing Corporation
563.264.4569

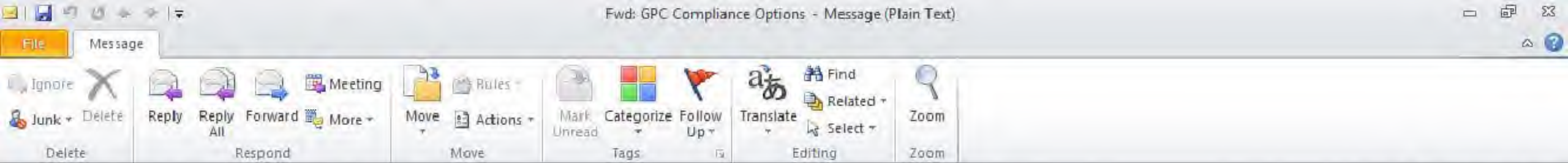


Biweekly report 12_10_09
Barb Lynch

As you know the Federal EPA criminal investigators have a search warrant and are going to GPC at Muscatine today, Thursday, Dec. 10, 2009. As I told you, tentatively there are going to be "24 investigators on a bus" which may or may not include our 2 Field Staff, Russ and Kurt from FO6. Russ and Kurt are planning on going with the group today and assisting in sampling of the storm sewer outfalls and even providing the bottles and sampling equipment. After that, it is unknown what all is expected from them. I am sure that there will be the obligation to testify for the case. This has a potential of being a huge time sink that we are not paid for to do by EPA, certainly it is not part of the PPG expectations. We will see how this one goes and make adjustments as to our responses to their future requests. At a minimum we will expect the EPA investigators to follow a chain of command when requesting resources for our Bureau.

This leads me to the question of your discussion at the 4 States meeting: what are the other 3 States doing in response to the EPA Criminal Investigators request of use of resources from each of the other states? What do the other 3 States anticipate they will be doing in response to continued and increased requests of resources from each state for the EPA criminal investigations.

We need to have to have further discussions about our response to Cedar Rapids request for a future meeting with you/us about our expectations of them to comply with their NPDES permit and Biosolids storage and proper disposal. I also think that we need to get EPA to finish their actions that they started and subsequently dropped for several reasons over 3 years ago with Cedar Rapids about SSOs.



From: Hutchins, Brian <Brian.Hutchins@dnr.state.ia.us> Sent: Mon 4/9/2007 5:09 PM
To: DSHERID@ag.state.ia.us
Cc:
Subject: Fwd: GPC Compliance Options

GPC prefers to take the approach that reduces emissions and modernizes an aged portion of our plant. However, with a significant increase in the cost, to take this approach a justification must be made to our ownership to spend the additional money. One piece of the puzzle that can help justify spending the extra money is if GPC could incrementally increase production prior to completing our full compliance with the consent decree.

PM10 PTE modeling of the current plant configuration results in High Second High (H2H) concentrations approaching 4000 $\mu\text{g}/\text{m}^3$. While this is a very high number, most high concentrations are due to low stacks close to the fence line and therefore high concentrations are pretty localized near the facility. Our first step would be to repermit many emission points to lower their PTE's closer to their actual emissions. This would drop the H2H by about 50% to around 2000 $\mu\text{g}/\text{m}^3$. The second step would be to make roughly half of the plant modernizations and raise some stacks. This step would again reduce the H2H by roughly another 50% to around 1000 $\mu\text{g}/\text{m}^3$. This step would also make significant reductions in actual PM, PM10, PM2.5, and VOC's. This is the point at which GPC wishes to increase the plant grind limit from 170,000 bu/day to around 190,000 bu/day. The changes proposed here and the increased grind would not trigger PSD permitting for PM10 and therefore would not require PM10 PTE modeling. At this point the IDNR could, but does not have to, require a model of actual PM10 emissions. Since this step (i.e. project) would be making a large improvement in the PTE model, which GPC would be willing to provide, GPC requests a model of actual PM10 emissions not be required. The final step in the consent decree compliance would be to complete the modernization work and raise additional stacks as necessary.

As you can see GPC is looking at a substantial additional expenditure to take the approach of modernization and emission reductions. If the extra expenditure can not be justified we will be forced to simply raise stacks. Please feel free to call me to discuss this further.

Thank You,

John D. Sparks
Director, Environmental Services
Grain Processing Corp.
563-264-4568



Memo

To: Dave Phelps
From: George Welch
Date: May 11, 2009
Re: Muscatine Power and Water

Later Thursday (May 7, 2009) EPA Region 7 staff met with us here at the DNR AQ offices. One of the issues was the status of the apparent PSD violations associated with Muscatine Power's (MPW) modifications to supply steam to Grain Processing (GPC) which allowed GPC to discontinue routine use of their natural gas boilers.

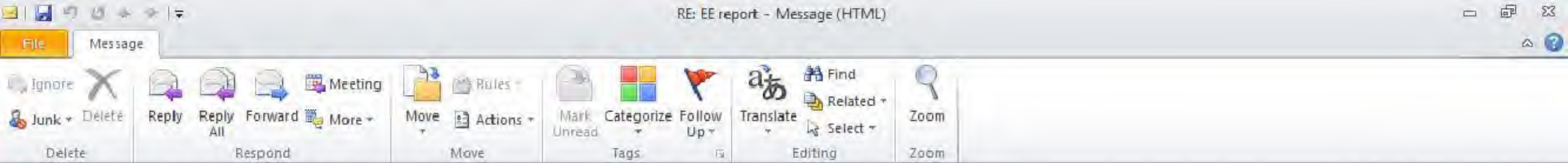
Whatever emission reductions GPC had as a result of this project are dwarfed by MPW's emission increases.

Thinking about the MPW/GPC project, I feel that any effort to assign the entire project to either source would be a distraction. Rather we should focus on resolving the ongoing PSD violation and the substantial environmental insult that resulted from the project.

MPW modified their Boiler 8. They built a new (smaller) turbine and build dedicated steam and return water lines to GPC to allow then to send substantial quantities of steam to GPC. This triggered PSD for MPW's Boiler 8.

EPA Region 5's 2001 letter to Minnesota regarding a similar Rochester Utility's project clearly supports this conclusion. Resolution of the subsequent environmental group's appeal through the Environmental Appeals Board affirmed this conclusion.

We need to resolve this ongoing PSD violation.



You forwarded this message on 3/26/2010 12:38 PM.

From: Durham, Mick <mick.durham@grainprocessing.com>
To: Levetzow, Kurt [DNR]
Cc:
Subject: RE: EE report

Sent: Thu 1/22/2009 9:22 AM

Thanks Kurt.

Due to the current economic situation, his position has been frozen and will not be filled until further notice. So I am the lucky one to fill in for him! Also the lock out continues, which is one of the reasons we have had so many excess emission reports recently. While we continue to meet all of our sales demands, every now and then an inexperienced operator does not perform the correct procedure, causing a temporary issue. We found that this was the case with the excess emissions from the boilers Wed morning. In general, though, they are doing pretty good. It will be nice to get this over with and go back to normal operation. I appreciate your patience and cooperation!

I'll send out the written report to you today.

Mick

Mick Durham
Grain Processing Corporation

From: Levetzow, Kurt [DNR] [mailto:Kurt.Levetzow@dnr.iowa.gov]
Sent: Wednesday, January 21, 2009 10:44 PM
To: Durham, Mick
Subject: EE report

Mick,

I received your verbal EE report tonight. I'll get it written up. Just submit the written report with any info you didn't have at the time of



From: Scott Young <SYoung@Polsinelli.com>
To: Book, Kelli [DNR]
Cc:
Subject: RE: GPC referral

Sent: Tue 4/5/2011 11:28 AM

thanx

do you know what their names are?



Scott A. Young
Shareholder

6201 College Blvd.
Suite 500
Overland Park, KS 66211

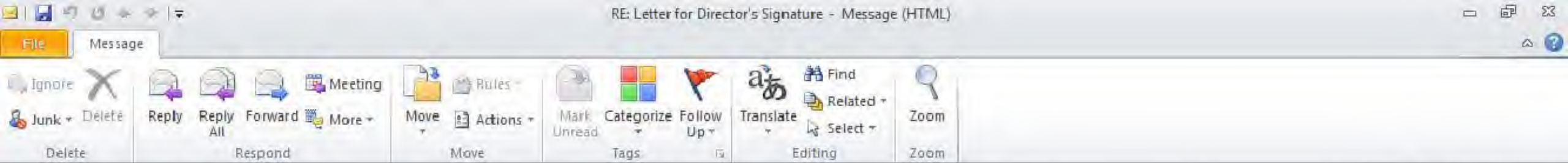
tel: 913.234.7426
fax: 816.572.5001

syoung@polsinelli.com
Add me to your address book...



From: Book, Kelli [DNR] [mailto:Kelli.Book@dnr.iowa.gov]
Sent: Tuesday, April 05, 2011 10:00 AM
To: Scott Young
Subject: GPC referral

Scott – I just wanted to give you a heads up, we have been contacted by residents of Muscatine who have stated they will be attending the EPC meeting on the 19th and plan to speak during the public comment period. They spoke to Jim McGraw and Jim explained that they would have to be present at 10:30 to speak. That is the extent I know. Kelli



From: Fitzsimmons, Catharine [DNR]
To: Gieselman, Wayne [DNR]
Cc:
Subject: RE: Letter for Director's Signature

Sent: Tue 7/13/2010 3:56 PM

Let me take a stab at this. We are trying to up the ante on encouraging GPC to get moving on a more realistic plan for reductions. The current plan does get some reductions, but not enough to reliably assure attainment, nor to do so quickly to reduce the public health impact quickly. We have been working with the environmental manager and have seen little effort to "move the needle" since they submitted their original plans.

So, I thought that a director's level letter to the president of GPC might help us get more action. We are currently anticipating that EPA will propose the "SIP call" in September - requiring us to modify the control strategies in the Muscatine area. The SIP call wouldn't become final until November or December. The SIP call will give us 12-18 months (depending on comments on the proposal) to get everything wrapped up in permits or orders. We hope that the letter will encourage GPC to rework their control strategy sooner than later since we have had so many exceedances in Muscatine this year (12). If we don't ask, we won't get what we need, and since we are still in a "voluntary" situation, I thought we might as well ask before we have to order.

Catharine

From: Gieselman, Wayne [DNR]
Sent: Monday, July 12, 2010 11:38 AM
To: McGraw, Jim [DNR]; Fitzsimmons, Catharine [DNR]
Cc: Krausman, Tammie [DNR]; Nissen, Lisa [DNR]
Subject: FW: Letter for Director's Signature
Importance: High

Jim, What is our purpose here and is this strong enough to accomplish it? Do we need to do this through an administrative order? Has legal been consulted on this?

Just random questions, but it looks like we want them to move faster than they have proposed. Given their history, will this accomplish our purpose?

